

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA, §  
§  
Plaintiff, §  
§  
v. § CIVIL NO. 4:18-cv-174  
§  
RICKIE McADAMS, §  
§  
Defendant. §

**DEFENDANT UNITED STATES OF AMERICA'S  
ORIGINAL COMPLAINT**

The United States of America complains as follows:

**Parties, Jurisdiction, and Venue**

1. The United States brings this suit to recover for damage to federal property caused by Defendant Rickie McAdams.
2. McAdams is believed to reside at 12844 C.R. 1047, Farmersville, Texas 75422.
3. The subject collision occurred on July 15, 2016, in Collin County, Texas.
4. This Court has jurisdiction over this suit under 20 U.S.C. § 1345.
5. Venue is proper in this district under 28 U.S.C. § 1391(b)(1)(2) and (3).

## Facts

6. On the morning of July 15, 2016, Aaron Wheeler, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, a law-enforcement agency in the United States Department of Justice, was driving, in a government-owned 2014 Dodge Charger, southbound on State Highway 78 near Farmersville, Texas, within Collin County. McAdams, driving a 1994 Chevrolet S-10 pickup truck, was at a stop sign in the eastbound lane on County Road 553, which runs perpendicular to State Highway 78.

7. Even though SA Wheeler had a free lane of travel on State Highway 78, McAdams decided to make a left turn from the stop sign on County Road 553 toward the northbound lane of State Highway 78. As McAdams did so he crossed directly in front of SA Wheeler, who was heading southbound on State Highway 78, hitting Wheeler's government-owned Dodge Charger.

8. As a result of McAdams's negligence, the government-owned Dodge Charger sustained considerable damage. The United States seeks to recover the fair value of the Charger and other expenses incurred by the government in connection with the crash, for a total of \$16,360.00.

**Claim**

**(Negligence)**

9. McAdams owed the United States a duty of reasonable care when operating his vehicle on June 15, 2016, yet he breached that duty and acted negligently by (but not limited to):

- a) failing to operate his vehicle in a reasonably safe manner;
- b) failing to yield the right-of-way;
- c) pulling in front of oncoming traffic while at a stop sign.

10. As a direct and proximate cause of McAdams's negligent actions, property owned by the United States was damaged in the amount of \$16,360.00.

**Prayer for Relief**

The United States thus requests the following relief from McAdams:

- 1. A judgment against McAdams in the amount of \$16,360.00;
- 2. Prejudgment interest;
- 3. Costs incurred by the United States in pursuing this action;
- 4. Post-judgment interest at the legal rate;
- 5. Such other and further relief to which the United States may be entitled.

Respectfully submitted,

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Eastern District of Texas

/s/ Bradley Visosky

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ATTORNEYS FOR THE UNITED  
STATES OF AMERICA